

Document Page 1 of 2
 IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	Bankruptcy Case No. 23-21947
James F. Thomas,)	
Debtor,)	Chapter 13
_____)	
)	
James F. Thomas,)	Doc. No.
Movant)	
)	
v.)	
Bank of America, N.A.,)	
)	
Respondent.)	

DECLARATION OF PLAN
SUFFICIENCY FOR MORTGAGE PAYMENT CHANGE

1. Respondent filed a Notice of Mortgage Payment Change (the "Notice") on August 28, 2024.
2. The Notice indicates that the monthly mortgage payment shall change from \$1680.58 to \$1715.33 per month.
3. The Notice further indicates that the monthly escrow payment shall change from \$550.53 to \$585.28 effective October, 2024.
4. Undersigned counsel has reviewed the existing Chapter 13 plan and the plan funding and determines that the plan is sufficiently funded to implement the **escrow** payment change.
5. Since Debtor's plan proposes to pay the principal in full, and pays the escrow separately, the Trustee should only implement the increased escrow component.
6. Debtor requests that the Trustee implement the Notice by changing the new total monthly escrow payment amount to \$585.28 beginning with the payment due October, 2024.
7. Contemporaneously with the filing of this declaration, the Chapter 13 Trustee and the affected creditor have been served with a copy of this declaration by electronic service.

Name of creditor: Bank of America, N.A.

Court claim number: 6 or () No claim filed.

/s/ Jana S. Pail

Jana S. Pail
 RAINES, FELDMAN, LITRELL, L.L.P.
 PA ID No. 88910
 11 Stanwix Street, Suite 1100
 Pittsburgh, PA 15222
 Tel: (412) 400-3833
 Email: jpail@Raineslaw.com

